

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA**

ALLISON COLLIER,)	
)	
PLAINTIFF,)	
)	
V.)	CASE NO: 07-00922
)	
UNIVERSAL FIDELITY, LP, ET AL.,)	
)	
DEFENDANTS.)	
)	

MOTION TO EXTEND TIME TO ANSWER

COMES NOW the defendant, National Asset Recovery, Inc., and respectfully requests this Honorable Court for a two-week extension to Answer the Complaint, and in support of this request shows as follows:

1. The undersigned firm has been contacted to represent the defendant in this matter. A responsive pleading is due today, March 24, 2008. The defendant and counsel are working diligently to respond to the Complaint but a short extension will allow additional information to be gathered and give the parties a more complete opportunity to assess how to proceed.

2. A two-week extension will not damage the substantive rights of any of the litigants. Should the Court allow an extension, it will not be necessary to delay the ultimate trial date, discovery deadlines, or disclosure requirements. This motion is made not to burden the Court's docket or to cause delay. To the contrary, a brief extension will promote the investigation into this matter and the potential resolution of this claim.

3. Prior to filing this motion, the undersigned spoke to opposing counsel's office. There is no objection to this motion.

WHEREFORE, PREMISES CONSIDERED, the defendant respectfully requests this Honorable Court allow a two-week extension to Answer the Complaint. If granted, the defendant's Answer would be due April 7, 2008. The Court's consideration of this motion is greatly appreciated.

Respectfully Submitted,

/s/ Neal D. Moore, III
Neal D. Moore, III,
Attorney for Defendant,
National Asset Recovery, Inc.

OF COUNSEL:

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CERTIFICATE OF SERVICE

This is to certify that on this the 24th day of March, 2008, a copy of the foregoing document has been electronically filed and served on counsel electronically via e-file:

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/s/ Neal D. Moore, III
OF COUNSEL